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12 *FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust I*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELENA ESPINO, Trustee of the Rommel and
Elena Espino Trust,

Plaintiffs,

vs.

STATEBRIDGE COMPANY LLC, a
Colorado Limited Liability Company;
WILMINGTON SAVINGS FUND SOCIETY,
FSB, d/b/a Christiana Trust as Trustee for
PNPMS Trust I; SABLES LLC, a Nevada
Limited Liability Company, MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., a Foreign Corporation; UNIVERSAL
AMERICAN MORTGAGE COMPANY, LLC,
a Florida Limited Liability Company; US BANK
NATIONAL ASSOCIATION, a National
Banking Association, AND DEFENDANT
DOES 1-100 AND ROES 3-10,

Defendants.

Case No.: 2:24-cv-02347-CDS-DJA

**STIPULATION AND ORDER TO
STAY DISCOVERY PENDING
RULING ON DISPOSITIVE MOTION
[ECF 6]**

Defendants, Statebridge Company LLC and Wilmington Savings Fund Society, FSB,
d/b/a Christiana Trust as Trustee for PNPMS Trust I (collectively “Removing Defendants”),
Defendant Sables LLC (“Sables”), and Plaintiff, Elena Espino (“Plaintiff” and with Sables and

1 Removing Defendants, the “Parties”), by and through their counsel of record, hereby stipulate
2 and agree as follows:

3 **WHEREAS**, on December 16, 2024, Removing Defendants removed Plaintiff’s First
4 Amended Complaint to this Court [ECF No. 1];

5 **WHEREAS**, on December 23, 2024, Removing Defendants filed a Motion to Dismiss
6 Plaintiff’s First Amended Complaint [ECF No. 6];

7 **WHEREAS**, the Motion to Dismiss is fully briefed as of January 13, 2025, when
8 Removing Defendants filed their Reply in Support of the Motion [ECF No. 15].

9 **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby
10 stipulate and agree as follows:

- 11 1. In the interests of judicial economy, the Parties stipulate and agree that discovery in
12 this case shall be **STAYED** pending the Court’s decision on the pending motion [ECF
13 No. 6];
- 14 2. Nothing contained in this stipulation will affect any pending dispositive motions or
15 prevent the Parties from filing any dispositive motions;
- 16 3. Each of the Parties may request a further Fed R. Civ. P. 26(f) conference at any time
17 180 days after the order granting this Stipulation;
- 18 4. By entering into this Stipulation, none of the Parties is waiving its right to
19 subsequently move the Court for an order lifting the stay in this action; and

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5. In the event the motion is denied, the Parties will submit a proposed discovery plan within thirty (30) days of the Court's Order.

IT IS SO STIPULATED.

DATED this 4th day of March, 2025.

WRIGHT, FINLAY & ZAK, LLP

HOMEOWNER RELIEF LAWYERS

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as Trustee for PNPMS Trust I

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The Court finds that the parties have demonstrated good cause to stay discovery. *See Schrader v. Wynn*, No. 2:19-cv-02159-JCM-BNW, 2021 WL 4810324, (D. Nev. Oct. 14, 2021). So the Court GRANTS their stipulation.

DATED this 11th day of April 2025.



DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE